UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN STREET
CHICAGO, IL 60604

EPA Region 5 Records Ctr.
243455

REPLY TO THE ATTENTION OF:

5HS-12

MEMORANDUM

DATE: NOV 19 1991

SUBJECT: Action Memorandum Request for a Removal Action at the Interstate Pollution Control / Rockford Roto-Rooter Site, Rockford, Winnebago County, Illinois (SITE ID NO. DC)

FROM: Paul R. Steadman, On-Scene Coordinator
Emergency and Enforcement Response Branch

TO: David A. Ullrich, Director, Waste Management Division

I. PURPOSE

The purpose of this memorandum is to obtain your approval to expend up to $862,447 to initiate and conduct a removal action at the Interstate Pollution Control / Rockford Roto-Rooter Site (The IPC Site) located at 2327 Magnolia Street, in Rockford, Illinois (61108). A Unilateral Administrative Order has been issued in August 1991 to all currently identified PRPs associated with this facility including Mr. Charles Kuhlberg, the lead Respondent in this action, to bring about early resolution of the conditions noted at this facility. The proposed action seeks to abate an imminent and substantial threat to public health and welfare and the environment due to the presence of large volumes of numerous volatile organic chemical compounds, PCBs (polychlorinated biphenyls) and inorganic chemicals including lead, cyanides and cadmium located within and about the facility. The proposed removal action is estimated to require 45-10 to 12 hour workdays to complete and an additional 60 days of off-site activity to arrange for final disposal of the wastes.

Current conditions at the IPC Site exist which, if not addressed by implementation of the response action documented in this Action Memorandum, may present an imminent and substantial endangerment to the public health or welfare or the environment.

This Site has been on the National Priorities List (NPL) since June 24, 1988 (See 53 Fed. Reg. 23997).

II. SITE CONDITIONS AND BACKGROUND

The IPC Site CERCLIS Identification number is ILT180011975.

A. Site Description

1. Removal site evaluation

The IPC Site is a 2.8 acre inactive waste storage facility which engaged in the receipt of varied solvents, paint sludges, cyanide containing wastes, and waste oils during its period of maximum activity in the years 1971 through 1982.

The IPC Site commenced operations as a waste oil recycler, industrial waste storage facility and hazardous waste transporter in June 1971. In October 1971, an incinerator for purposes of thermal destruction of an estimated 3,500 gallons of cyanide compounds per week was installed. Other waste management units installed on the Site and still existing include an above ground storage tank (AGST) with an approximate capacity of 100,000 gallons, and six or seven underground storage tanks (USTs) with capacities ranging from 10,000 to 20,000 gallons each, and a waste disposal lagoon impoundment which, during peak site activity, occupied an approximate one acre area of the site which is now partially capped, i.e., largely filled with earthen materials.

2. Physical location

The Site is located in a mixed medium to heavy industrial area on Rockford's south side wherein small residential concentrations of the local populous are found to the east and north of the site. The site is legally described as within the Southeast 1/4 of Section 34 and within the Southwest 1/4 of the Southwest 1/4 of Section 35, Township 44 North, Range 1 East.

The site's physical location is northwest of the intersection of Peoples and Seminary (Magnolia) Avenues. It is bounded on the south by Quaker Avenue (an extension of Peoples Ave.) which leads to the former Quaker Oats Company at this location, on the north by a dirt road and the Rockford Gunite Pond, on the east by Seminary Avenue, and on the south by a railroad track leading to an industrial facility to the west.

3. Site characteristics

The Site is currently not adequately fenced to control access, the earthen cap over the lagoon/impoundment is largely eroded to the extent where contaminated materials are subject to transport by wind and erosion to adjacent and off-site areas, the AGST and the USTs are of serious safety concern both from an environmental perspective and human endangerment potential due to insecure openings in the ground level manhole accessways and ladder which provides entry to the top manhole access of the AGST.

The Site's topography is predominantly flat with a relatively small rise on the east, northeast central area of the site which is a mound associated with the " capped lagoon " impoundment area.

Geologic aspects of the site include upper bedrock formations consisting chiefly of dolomites. The site is underlain by sandstone which comprises the principle aquifer of Winnebago County and most of northern Illinois. Surface and groundwater flows associated with the Site indicates general flow patterns towards the southwest in the direction of the Rock River.

4. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant

Among the seventeen CERCLA hazardous substances, thirteen (13) were identified on the Site and as being in excess of action limits. Those priority pollutants identified at the IPC Site include benzene, cadmium, chloroform, chromium, cyanide, 1,2-dichloroethane, lead, methyl isobutyl ketone, nickel, toluene, 1,1,1-trichloromethane, trichloroethylene, and xylene. In all, during the period from March 1979 through December 1990, eight separate sampling events were performed at this facility, each of which indicated elevated levels of varied environmental chemical contaminants which have serious public health implications. A sample tabulation of the numerous types of hazardous substances found at the Site and their analytical results is included in Table 1.

Based on a study and report performed and prepared by a U.S. EPA contractor (Ecology & Environment)in 1986, the local aquifer beneath the Site is contaminated with, among other pollutants, xylene, benzene, toluene, 1,1,1-trichloroethene, chloroform, 1,2-dichloroethane, cadmium, zinc, cyanide, chromium and lead. Further, additional sampling in 1988 conducted by this Agency's contractors showed the presence of elevated heavy metal and volatile organic chemical contamination in the surface soils of the Site. Sampling events conducted by both this Agency and the PRP's contractors in 1989 and 1990 also demonstrated the presence of low flashpoint

hazardous liquids stored on the site in USTs and the AGST, polychlorinated biphenyls (PCBs), volatile organic chemical compounds and inorganic heavy metal contaminants, including cyanide. There also is evidence of recent open dumping of residential and industrial wastes at the Site.

5. NPL status

The IPC Site was placed on the National Priorities List (NPL) on June 24, 1988. This listing occurred because of previous Hazard Ranking System (HRS) scoring in 1987 by this Agency whereby a score of 46.01 was assigned.

6. Maps, pictures and other graphic representations

Refer to Figures 1 and 2 which show the general layout and location of this site. See Table I which presents a tabulation of the contaminants identified on the IPC site.

B. Other Actions to Date

1. Previous actions

As a result of an attempt by IPC to clean-up the unlined impoundment/lagoon, wherein large quantities of hazardous substances have been evidenced to have been deposited, in December of 1979, an estimated 180 cubic yards of contaminated soils were removed but it is unknown whether sludges were removed during this effort and prior to installation of the earthen "cap."

Also in 1979, the National Enforcement Investigations Center (NEIC) performed varied sampling of soils and liquids which were ponded within the Site and detected cyanide in concentrations as high as 14 ppm in every sample collected from the site area. NEIC's sampling also disclosed the presence of several organic compounds and inorganic heavy metal contaminants. As well, the Illinois Environmental Protection Agency's (IEPA) manifest system documents the receipt of at least 5.5 million gallons of hazardous waste at the Site since 1979.

2. Current actions

The State of Illinois Environmental Protection Agency has been actively involved in providing the State's position concerning the removal actions prescribed for the IPC Site. Our contact within IEPA, Mr. Scott Moyer, and other representatives have continually offered input and concerns during several scheduled meetings between this Agency and the PRPs and IEPA's collateral requisites towards resolving the environmental hazards associated with the IPC Site.

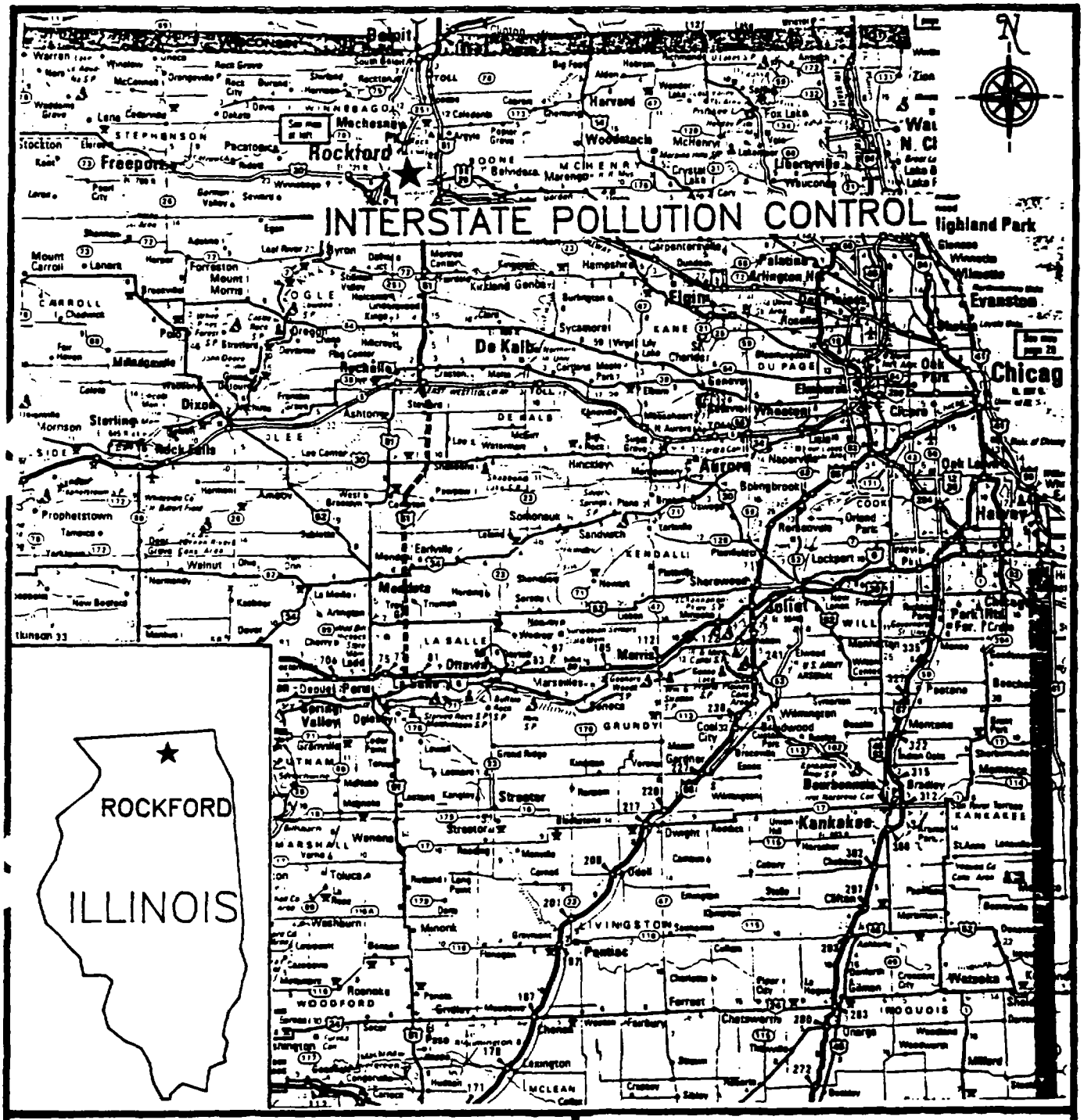

FIGURE 1

SITE LOCATION MAP

INTERSTATE POLLUTION CONTROL

ROCKFORD, ILLINOIS

1 INCH=20 MILES

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DRAWN BY	DATE	PCS #
M.S.P.	10-10-89	2369
APPROVED BY	DATE	TDD #
R.MEHL	10-10-89	5-8908-26

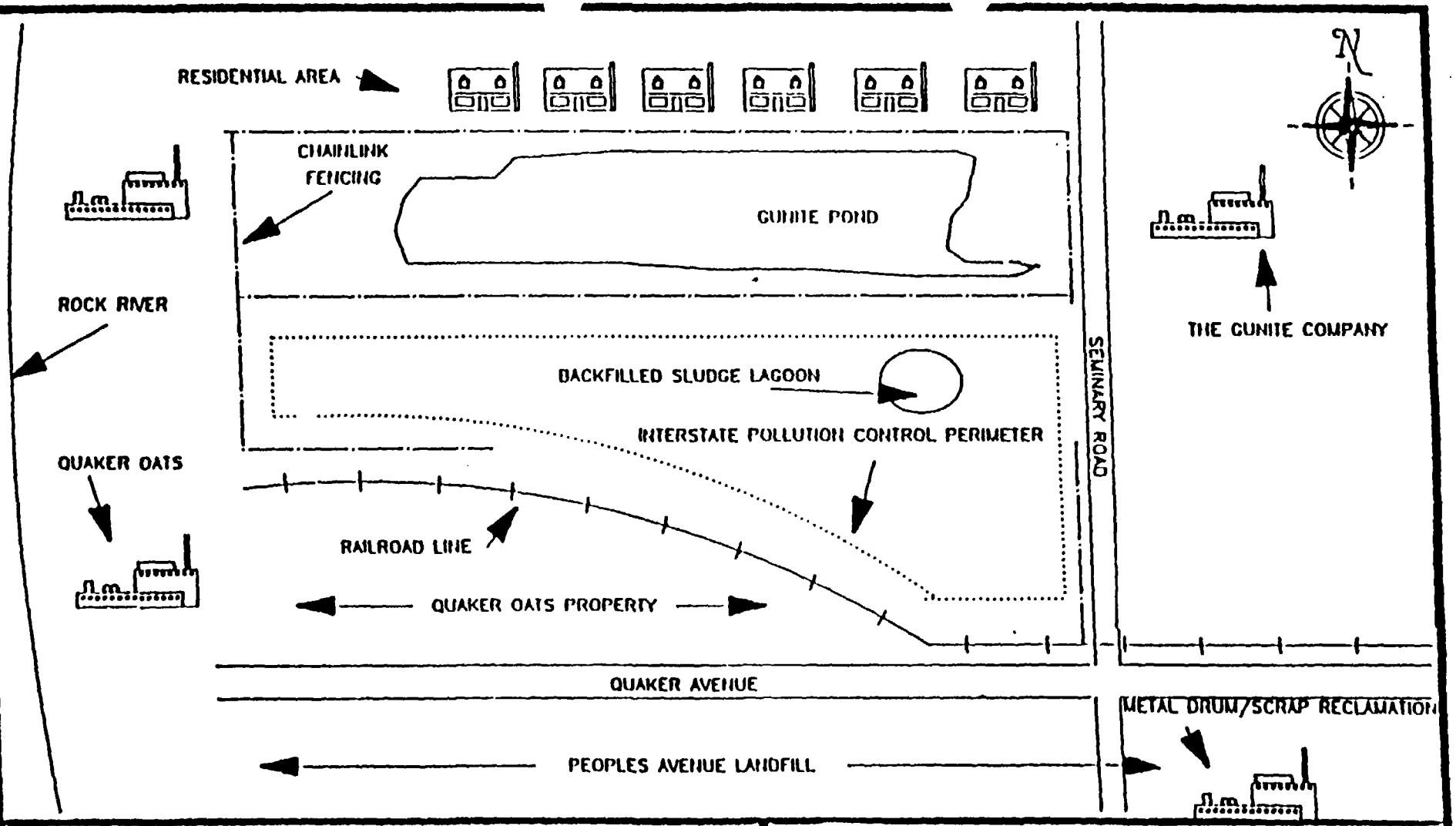

FIGURE 2
SITE MAP
INTERSTATE POLLUTION CONTROL
ROCKFORD, ILLINOIS
NOT TO SCALE

UNITED STATES OF AMERICA
ENVIRONMENTAL PROTECTION AGENCY

DRAWN BY M.S.P.	DATE 10-10-89	PCS # 2309
APPROVED BY R. MEHL	DATE 10-10-89	TDD # 5-8908-28

TABLE I

List of Typical Contaminants Identified Within the IPC Site and their High and Low Concentrations *

VOLATILE ORGANIC CHEMICALS (ug/Kg)	
Acetone	5,400 to 48,000
Benzene	630 to 120,000
2-Butanone	4,700 to 27,000
1,1-Dichloroethane	25,000 to 270,000
Ethylbenzene	490 to 380,000
Methylene chloride	3,600 to 31,000
Styrene	630 to 1,300
1,1,1-Trichloromethane	3,400 to 110,000
Trichloroethene	2,600 to 590,000
Toluene	2,400 to 550,000
Xylene	2,100 to 840,000
POLYCHLORINATED BIPHENYLS (PCBs) (ug/Kg)	
Aroclor 1254	1,200 to 3,100
HEAVY METALS (mg/Kg)	
Arsenic	0.36 to 1.8
Barium	36.7 to 127.0
Cadmium	0.92 to 3.2
Chromium	1.80 to 63.0
Cyanide	0.43 to 13.6
Lead	0.81 to 154.1
Mercury	0.068 to 3.4
Zinc	3.9 to 650.3

(* Based on sample results provided by IEPA November 1989)

C. State and Local Authorities' Roles

1. State and local actions to date

The IPC Site is an Illinois State-lead remedial site. It has been a matter of continuing efforts to resolve the hazardous substance and materials deposit and contamination problems associated with this site since at least 1976. As well, this facility has been the object of concerted efforts by the Winnebago County Health Department to be cleaned up and removed as a hazard to the community since at least 1973.

A partial Consent Decree has been negotiated between the Settling Defendants (PRPs) and the Illinois Environmental Protection Agency. This decree has been filed with the United States District Court in Rockford, Illinois. The Consent Decree includes a statement of work (SOW) for conduct of a RI/FS at the Site.

Also, numerous local political representatives as well as the Illinois Department of Public Health desire to provide input on this removal action and to be apprised of its results and receive data on health assessments and final decontamination verification data.

2. Potential for continued State/local response

This an Illinois State-lead remedial site. The IEPA is actively participating in scheduling and preparing for the remedial response aspect on the IPC Site.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT

CERCLA and the National Contingency Plan, 40 CFR Part 300.415, Paragraph (b)(2), as amended, lists factors to be considered when determining the appropriateness of a potential removal action at a site which is reasonable and necessary to protect the public health, welfare, and the environment. The following discussion presents a summary of those factors which are applicable to the IPC Site:

a. actual or potential exposure to hazardous substances by nearby populations, animals, or the foodchain from hazardous substances or pollutants or contaminants;

This factor is present at the facility due to the existence of large quantities of flammable and hazardous substances stored on site within a system of underground and above ground storage tanks with insufficient containment mechanisms. Also present are heavily contaminated surface soils which form the cap for the former unlined surface impoundment.

b. actual and potential further contamination of drinking water supplies or sensitive ecosystems;

This factor is present at the facility due to the existence of contaminants, including volatile organic chemical compounds, cyanide and mercury deposited in the unlined surface lagoon/impoundment; and potentially leaking underground and aboveground storage tanks containing ignitable hazardous substances which create a substantial endangerment to groundwater supplies in the region of the site.

c. hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers pose a threat of release;

This factor is present at the facility due to the existence of at least six underground storage tanks and one aboveground storage tank which contain highly ignitable substances, volatile compounds and oily sludges in a total estimated volume of 220,000 gallons.

d. high levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate;

This factor is present at the facility due to the presence of eroded unstabilized soil conditions over the surface of the former surface impoundment in the northeast central portion of this site containing elevated concentrations of cyanides, cadmium, chromium, lead and zinc.

e. weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or to be released;

This factor is present at the facility due to the existence of exposed surface conditions at and within the former surface impoundment area located at the northeast central portion of the site which may be transported off-site as a result of wind erosion and as a result of major precipitation events.

f. threat of fire or explosion;

This factor is present at the facility due to low flashpoint liquid or semi-liquid substances showing ignitability characteristics of or less than 140 degrees Fahrenheit (< 45.8 degrees C) contained in the aboveground storage tank and some of the underground storage tanks. The threat of fire or explosion also would result in the off-site transport of hazardous particulate matter to uncontaminated areas adjacent to the site.

g. other situations or factors which may pose threats to public health or welfare or the environment.

This factor is present at the facility due to the lack of site access controls, unsecured entry to structures where flammable substances are stored, and unsecured entryway covers to underground storage tanks which pose a significant potential endangerment to persons who might inadvertently enter the site area.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of pollutants and contaminants from this site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment. As detailed in Section III, the presence of the hazardous substances and contaminants on this facility will pose undue risk to public health and the environment as a result of their potential to pollute the groundwater as well as surface water systems and to remain available as an airborne contaminant to be spread to currently uncontaminated areas.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

Mitigation of the threats to human health and the environment at IPC site would involve the removal and disposal of six to seven 10,000 to 20,000 gallon capacity underground storage tanks (USTs) as well as their contents and one 100,000 gallon capacity aboveground storage tank (AGST) including its contents, excavation and disposal of visibly contaminated soils associated with these tanks, placement of an estimated 1600 cubic yards of low permeability soils (clays with low Proctor values) and gravel to form an earthen " cap " over the surface of the unlined former impoundment/lagoon area to arrest the effects of wind and precipitation erosion which have exposed a considerable portion of the buried contaminants, and erection and installation of a site access restriction fence around the periphery of this site.

Off-site incineration and disposal of the hazardous wastes and substances contained in the tanks during site decontamination, is a treatment option most favored by the PRPs as a means of ridding this facility of the contaminants. However, this treatment option, as currently proposed, includes separation of hazardous fractions from nonhazardous fractions within the tanks. Treatment of the water (i.e., nonhazardous fraction) is most likely to be through physical or biological means, although chemical treatment might be proposed.

Contaminated soils removed from the tank locations will be containerized and shipped off-site for treatment/disposal.

The cost estimate prepared for the mitigation of threats at the site addresses the removal of liquid and semi-liquid wastes and contaminated soil from the facility. The costs associated with the removal also include soil excavation, capping of the impoundment/lagoon, building demolition, and securing the site. These activities are estimated to require a total of 45 10-hour work days and cost approximately $862,500.

The proposed work plan includes the following tasks:

a. Implement site safety and health plan, an air monitoring program and the sampling and analysis plan.

b. Provide for 24-hour security at the site during on-site activities.

c. Sample, bulk package, and stage for subsequent off-site treatment/disposal, chemical contaminants and hazardous substances present in the storage tanks at the site.

d. Decontaminate, dismantle and remove the storage tanks, and arrange for their ultimate disposal.

e. Excavate, sample, determine the extent of contamination, and package contaminated soil present within the tank locations at the site for subsequent off-site disposal.

f. Secure and restore site after completing all on-site removal actions.

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants or contaminants at this facility which may pose an imminent and substantial endangerment to public health and safety, and to the environment. These response actions do not impose a burden on affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

2. Contribution to remedial performance

a. Because an RI/FS is only at the beginning stage, there is currently no specific long-range remedial action plan established as yet. The range of feasible alternatives include groundwater extraction and treatment either for aquifer cleanup or for interception of a groundwater plume, capping, and soil removal and consequent treatment, if necessary, and disposal.

b. The removal of the contaminated storage tanks on the site and the hazardous materials and substances within them, as well as the removal of the contaminated surface soils beneath these tanks and the stabilization of the soils located on the central northwestern and northeast portion of the site, and the installation of a security fence all contribute to remedial performance. Without these removal action phases the site will continue to pose an imminent and substantial threat to human health and the environment if they are not addressed as part of an immediate removal action. The hazard will exist because access to the site is not adequately restricted presently (trespassers have been observed periodically within the site area) and the identified hazardous substances inside of the tanks and within the unlined former impoundment/ lagoon are shown to migrate outside of the facility and into adjacent areas as a result of lost structural integrity of the tanks and because of wind and precipitation erosional runoff which carries the contaminants either into the groundwater or off-site.

c. The prescribed removal action should proceed as far as necessary to at least stabilize the site conditions while the RI/FS is being conducted and the remedial design is carried out. The prescribed removal action proposes to fulfill this requirement by decontamination of the site, fencing the site periphery, containerizing for subsequent disposal of surface soils and soils immediately beneath the storage tanks which may have become contaminated by the hazardous materials which possibly leaked from the tanks, and the upgrading of the cap over the impoundment whose current condition demonstrates the ongoing migration and transport of contaminants into adjacent areas from the site.

d. This removal action will markedly facilitate the conduct of the RI/FS which is scheduled to commence as soon as the State of Illinois' Consent Decree is signed by the Court. This action is anticipated at any time, thus the RI/FS may begin in the first quarter of the current fiscal year of 1992. Actual field work is not anticipated to begin prior to the beginning of the second quarter of FY92. The removal action will bolster conditions and assist in this endeavor by restricting site access from vandals, trespassers, and the public in general.

As well, since the site area is relatively small, encompassing less than three acres, one of which is occupied by the impoundment/ lagoon, there is adequate room for equipment operation which is to be used in the conduct of the RI. The proposed removal action is consistent with the long-term remedy to be proposed and formulated thus. The remedial program will provide for post-removal site control.

3. Description of alternative technologies

Alternatives to land disposal of the on-site contaminants have been considered but to date have not been finalized as a viable or definitive methodology which precludes the land disposal option. Those technologies currently under consideration include: incineration, solidification, fuel blending and supplementation by the hazardous substances and materials, and stabilization and capping of the entire facility.

4. Engineering Evaluation/Cost Analysis (EE/CA)

The EE/CA discussion concerning alternative actions for consideration is not applicable to the IPC Site proposed removal action. This action is a time-critical removal.

5. Applicable or relevant and appropriate requirements (ARARs)

All applicable or relevant, and appropriate requirements (ARARs) will be complied with to the extent practicable. Federal ARARs determined to be applicable for the IPC Site include UST standards, the CWA, SDWA, CERCLA and RCRA regulations as well as DOT hazardous materials transport requirements.

In the matter of State of Illinois ARARs which may be applicable to this site, a letter has been sent to the Illinois Environmental Protection Agency (IEPA) requesting that it identify State ARARs. Any State ARARs that have been identified in a timely manner for this removal action will be complied with to the extent practicable. Comments from primary contacts of the IEPA were received from Mr. Scott Moyer as well as from Mr. Kurt Neibergall and Steve Washburn who have currently identified hazardous waste sampling and classification standards, hazardous waste transportation standards in Illinois, solid waste disposal rules, TSD requirements, and underground storage tank standards are among the notable ARARs to be addressed at the IPC site.

6. Project schedule

The proposed removal action is estimated to require 45-10 to 12 hour workdays to complete. However, disposal delays may lengthen actual site cleanup completion by as much as an additional 90 to 120 days. The current target date for the onset of removal operations is scheduled for the week of November 25, 1991.

B. Estimated Costs

REMOVAL PROJECT CEILING ESTIMATE

Extramural Costs:

Cleanup Contractor	$539,348.00
Contingency (20%)	107,870.00
Subtotal	$647,218.00
TAT/TES	39,988.00
Extramural Subtotal	$687,206.00
Extramural Contingency (20%)	137,441.00 a)
TOTAL EXTRAMURAL COSTS	824,647.00

Intramural Costs:

U.S. EPA Direct Costs [$30 x (450 Regional hrs + 45 HQ hrs)]	$ 14,850.00
U.S. EPA Indirect Costs [$53 x (450 Regional hrs)]	22,950.00
TOTAL INTRAMURAL COSTS	$ 37,800.00
TOTAL REMOVAL PROJECT CEILING ESTIMATE:	$862,447.00

a) This extramural contingency may be allocated as needed between the clean-up contractor (ERCS) and the TAT (e.g., $100,000 for ERCS contingency and $37,441 for a TAT/TES contingency).

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

The I.P.C. site will remain as a potential and continuing threat to public health and the environment if no action is taken or if further action is not taken in the immediate future to abate or totally eliminate the hazardous conditions at this facility. The public will have unrestricted access to highly contaminated soils and other hazardous substances. The RI/FS will be delayed because of the hazardous site conditions which in turn will delay implementation of the final remedy.

VII. OUTSTANDING POLICY ISSUES

There are no currently applicable outstanding policy issues associated with the IPC site.

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for the IPC Site is contained in an Enforcement Confidential attachment (Attachment I).

IX. RECOMMENDATION

This decision document represents the selected removal action for the IPC site in Rockford, Winnebago County, Illinois and is developed in accordance with CERCLA as amended by SARA, and the National Contingency Plan. This decision is based on the Administrative Record for the site. An attached index is included to identify the items which comprise the Administrative Record upon which the selection of the removal action is based. Because the conditions at the IPC site in Rockford, Illinois meet the National Contingency Plan, 40 CFR Section 300.415 (b)(2) criteria for a removal action, I recommend your approval of the proposed removal action. With your approval the project ceiling will be $862,447.00 of which up to $784,659.00 may be used for the ERCS contractor costs. Please indicate your concurrence and decision by endorsement below.

APPROVAL: David A. Ullrich DATE: 11/19/91
DIRECTOR, WASTE MANAGEMENT DIVISION

DISAPPROVAL: _____ DATE: _____
DIRECTOR, WASTE MANAGEMENT DIVISION

bcc: T. Johnson, OS-210
A. Baumann, 5HS-12
R. Powers/R. Buckley, 5HS-GI
R. Bowden, 5HS-12
P. Schafer, 5HS-12
T. Geishecker, 5HS-12
T. Gioia, 5HS-12
D. Bruce, HSE-5
L. Fabinski, ATSDR, 5HS-11
O. Warnsley, CRU, 5HS-TUB-7
T. Lesser, 5PA-14
F. Myers, 5MA-14
Sheila Huff, U.S. Department of the Interior,
230 S. Dearborn, Room 3422, Chicago, IL 60604
Contracting Officer, 5MCC-TUB-4
P. Steadman, 5HS-12
J. Breslin, ORC, 5CS-TUB-7
C. Graszer, 5HS-12
B. Schorle, RPM, 5HS-11
State Agency Superfund Coordinator
EERB Read File (Margie Johnson)
EERB Delivery Order File (Charles Brasher)
EERB Site File (Char Gwizdala)

ATTACHMENT I

ENFORCEMENT CONFIDENTIAL INFORMATION

Redacted-information not relevant to the selection of the removal action.

ATTACHMENT II

DETAILED CLEANUP CONTRACTOR COST ESTIMATE

Summary Report

Cost Projection Summary	
Contractor Personnel	$86,790.00
Contractor Equipment	24,420.00
Unit Rate Materials	19,305.00
At Cost Materials	0.00
Subcontractors	22,500.00
Transportation & Disposal	386,333.00
Subtotal	539,348.00
Contractor Contingency (20%)	107,870.00
Cleanup Contractor Est'd Total	647,218.00

ATTACHMENT III

ADMINISTRATIVE RECORD
FOR
INTERSTATE POLLUTION CONTROL

July 13, 1990

DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION	PAGES
4/27/90	ATSDR	L. Zintak	Review of data	1
2/23/90	Weston	D. Heaton	Site assessment	10
1/29/90	Bernard Schorle	Jack Barnette	Sample results	13
1/12/90	Bernard Schorle	L. Zintak	Analytical results	62
12/20/89	Suburban Labs	Weston	Analytical results	17
10/13/89	Weston	D. Heaton	Site review	7
9/30/88	Weston	S. Faryan	Site investigation	19
9/13/88	Weston	S. Faryan	Technical review	12

UPDATE

July 16, 1991

06/26/80	U.S. EPA	Kullberg, C., Interstate Pollution Control, Inc.	Notification of Hazardous Waste Activity	3
04/29/81	U.S. EPA	Kullberg, C., Interstate Pollution Control, Inc.	Notification of Hazardous Waste Site	2
03/16/84	Munger, R., IEPA	Anderson, L., IPC, Inc.	Preliminary Assessment with Attachments	14
03/04/87	Kulbersh, M., Getty, K., FIT	U.S. EPA	Site Description	7
10/30/89	Niedergang, N., U.S. EPA	Bowden, R., U.S. EPA	Recommendation to Issue 106 Order	1

01/10/90	Schorle, B., U.S. EPA	Moyer, S., IEPA	Conversation Record	1
04/25/90	Matz, S., Doyle, W., Weston	Heaton, D., U.S. EPA	Cost Projection	5
06/29/90	Steadman, P., Schorle, B., U.S. EPA	File	Status Report on Removals at NPL Sites	1
07/16/90	IEPA		PRP Meeting Report	5
08/19/90	Wanner, B., NET, Inc.	Kullberg, C., IPC, Inc.	Analytical Report	2
09/27/90	Wanner, B., NET, Inc.	Steadman, P., U.S. EPA	Analytical Report, Sample Nos. 79394-79400	29
01/07/91	Marks, G., TEI Analytical, Inc.	Milken, J., E & E	Laboratory Report	5
01/25/91	Toney, M., Baker & McKenzie	Moyer, S., Schorle, B., Steadman, P., U.S. EPA	Correspondence Regarding Access	2
03/26/91	Davis, W., E & E	Heaton, D., U.S. EPA	Site Activity Report	45
04/08/91	Bowden, R., U.S. EPA	Janssen, J., IEPA	Correspondence Regarding Administrative Order for Removal Action	2
05/07/91	Radian Corp.		Analytical Data Summary	19
05/24/91	Williams, R., Golder Assoc. Inc.	Steadman, P., Moyer, S., U.S. EPA & IEPA	Technical Memorandum, Final	180
07/11/91	Steadman, P., U.S. EPA	Janssen, J., IEPA	Request for Identification of ARARs	1
00/00/00	Steadman, P., U.S. EPA	Ullrich, D., U.S. EPA	Action Memorandum	
08/07/91	Traub, J., U.S. EPA		Unilateral Administrative Order	21

UPDATE

August 26, 1991

07/18/91	Moyer, S., IEPA	Steadman, P., U.S. EPA	Request for IEPA ARAR's	5